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The Honorable Rebekah Warren, Chair
House Great Lake and Environmental Committee
987 Anderson House Office Building
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Dear Chairwoman Warren and members of the House Great Lakes and Environment Committee:

Please accept this correspondence indicating support for House Bill 5931 paving the way for the Michigan Department of Community Health to administer the Renovation, Repair and Painting Rule (RRP) in recently promulgated by the Environmental Protection Agency on behalf of the citizens of Michigan.

As a member of the Michigan Childhood Lead Poisoning Prevention and Prevention Commission and the National Association of Home Builders Remodelers Lead Based Paint Task Force, an EPA certified RRP training provider and former remodeling contractor, I am keenly aware of the need to control the creation of lead dust on renovation projects.

Having been involved in the drafting of the RRP both at the federal and state levels, I do make the following recommendations for your consideration:

- 1) **Ensure Enforcement/Increase Fees:** As proposed the firm registration fee of \$60 will not create enough funding for MDCH to properly enforce Michigan's RRP. Such a rule will not be complied with by a great number of legitimate contractors for known lack of enforcement and by the very large number of illegitimate "contractors" who don't comply with most laws and regulations pertaining to remodeling. To promulgate a law to protect Michigan's children without sufficient enforcement capacity is frankly, irresponsible.
- 2) **Expand Language Regarding Weatherization:** References made in Sec. 5459 (12) (C) to 'weatherization' should be expanded to include any renovation activity conducted to increase the energy efficiency of target housing. With so much emphasis being put on energy efficiency, the term 'weatherization' does not encompass all of the renovation activities that will be performed in with the goal of reducing energy consumption and carbon emissions.
- 3) **Include Speculative Renovation:** Section Sec. 5460B (2) provides exemptions for homeowners from complying with RRP work practices. Language should be specific that speculative renovations done by owners of target housing must comply.
- 4) **Use of the Word 'Employing':** Section 5459 indicates, "All renovation regulated by this part shall be performed by certified renovation firms employing not less



than 1 certified renovator..." With the vast majority of contractors being independent contractors, they will read this language and say to themselves, "This rule does not apply to me as I have no 'employees'. This section should be specific that each certified firm shall have not less than one certified renovator period, with no mention of said certified renovator being an employee.

Again, please accept this correspondence as a letter of support for the State of Michigan to administer the Renovation, Repair and Painting Rule. My suggestions are intended to make such legislation stronger giving even more protection from exposure to lead paint dust to Michigan's children.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Brindley Byrd", with a stylized flourish at the end.

Brindley Byrd
President